## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

PHILLIP DANIEL, on behalf of himself and	)
all others similarly situated,	)
Plaintiffs,	) ) ) CA No. 3:20-cv-00655-RJC-DCK
v.	)
STERICYCLE, INC.; and SHRED-IT USA,	) )
LLC,	)
	)
Defendants.	)

# JOINT MOTION FOR FURTHER EXTENSION OF TIME TO FOR PLAINTIFF TO FILE UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AND NOTICE TO ADVISE THE COURT OF STATUS OF SETTLEMENT

NOW COMES the Parties, jointly, by and through their counsel, and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 6.1(a), and respectfully request a further extension of Plaintiff's deadline to file his Unopposed Motion for Preliminary Approval of Class-Wide Settlement, Proposed Settlement Agreement, and all other related documents from July 31, 2023 to August 31, 2023.

On July 7, 2023, Plaintiff filed an unopposed motion with the Court seeking an extension of time, until July 31, 2023, to file the Unopposed Motion for Preliminary Approval of Class-Wide Settlement, Proposed Settlement Agreement, and all other related documents. (Dkt. No. 97). The Court granted the motion on July 10, 2023. (Dkt. No. 98).

Consistent with Plaintiff's July 7 unopposed motion and the Parties' Initial Joint Notice (Dkt. No., 94), they have been working diligently and productively to reach final agreement on all material terms of settlement, memorializing those terms in a formal settlement agreement, as well as providing Plaintiff ample opportunity to prepare his unopposed motion for preliminary approval of the proposed

settlement along with the notice of the same for Defendant's review and approval before filing with the Court. The Parties have continued working cooperatively to finalize all such settlement documents but realistically require additional time to do so.

WHEREAS, the Parties anticipate that this will be the final request for extension that is sought prior to the filing of Plaintiffs' Unopposed Motion for Preliminary Approval of Class-Wide Settlement, Proposed Settlement Agreement, and all other related documents.

WHEREAS, the Parties respectfully request that the Court permit Plaintiff until **Thursday**, **August 31, 2023** to file the Unopposed Motion for Preliminary Approval of Class-Wide Settlement, Proposed Settlement Agreement, and all other related documents.

Respectfully submitted this July 26, 2023.

#### /s/ Gilda Adriana Hernandez

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## **CERTIFICATE OF SERVICE**

I hereby certify that on July 26, 2023, I electronically filed the foregoing true and accurate copy of the JOINT MOTION FOR FURTHER EXTENSION OF TIME FOR PLAINTIFF TO FILE UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AND NOTICE TO ADVISE THE COURT OF STATUS OF SETTLEMENT with the Court using the CM/ECF system, and have thereby electronically served the document to the following:

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